

EXHIBIT 4

PUBLICATION NOTICE

NOTICE OF CLASS ACTION AND PROPOSED SETTLEMENT

This Notice relates to a proposed settlement (“Settlement”) of a class action lawsuit (“Action”) filed against Facebook relating to a particular Facebook feature called “Sponsored Stories.” If prior to [date of entry of Preliminary Approval Order] you or your child are or were a Facebook user in the United States and a Facebook Sponsored Story featured your or your child’s name and profile picture, you or your child may be a “Class Member” in the Action.

What is the Action about? The Action claims that Facebook unlawfully used the names, profile pictures, photographs, likenesses, and identities of Facebook users in the United States to advertise or sell products and services through Sponsored Stories without obtaining those users’ consent. Facebook denies any wrongdoing and any liability whatsoever. No court or other entity has made any judgment or other determination of any liability.

What is a Sponsored Story? Sponsored Stories are a form of advertising that typically contains posts which appeared on facebook.com about or from a Facebook user or entity that a business, organization, or individual has paid to promote so there is a better chance that the posts will be seen by the user or entity’s chosen audience. Sponsored Stories may be displayed, for example, when a Facebook user interacts with the Facebook service in certain ways, such as by clicking on the Facebook “Like” button on a business’s, organization’s or individual’s Facebook page. Sponsored Stories typically include a display of a Facebook user’s Facebook name (i.e., the name the user has associated with his or her Facebook account) and/or profile picture (if the user has uploaded one) with a statement describing the user’s interaction with the Facebook service, such as “John Smith likes UNICEF,” “John Smith played Farmville,” or “John Smith shared a link.”

What relief does the Settlement provide? Facebook will pay \$20 million into a fund that can be used, in part, to pay claims of Class Members (including Minor Class Members) who appeared in a Sponsored Story. Each participating Class Member who submits a valid and timely claim form may be eligible to receive up to \$10. *The amount, if any, paid to each claimant depends upon the number of claims made and other factors detailed in the Settlement. No one knows in advance how much each claimant’s share will be or whether any money will be paid directly to claimants.* If the number of claims made renders it economically infeasible to pay money to claimants, payment will be made to the not-for-profit organizations identified on the Settlement website at [www.\[xxx\].com](http://www.[xxx].com). These organizations are involved in educational outreach that teaches adults and children how to use social media technologies safely, or are involved in research of social media, with a focus on critical thinking around advertising and commercialization, and particularly with protecting the interests of children. In addition to monetary relief, Facebook will revise its terms of service (known as the “Statement of Rights and Responsibilities”) relating to Sponsored Stories and give users (and minor users’ parents or legal guardians) additional information about and control over the use of their (and their children’s) names and profile pictures in Sponsored Stories.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

- **SUBMIT A CLAIM.** This is the only way to be eligible to receive a payment, if the Court orders payment to Class Members. The deadline to submit a claim is [Month] [Day], [Year].
- **EXCLUDE YOURSELF:** This is the only option that allows you to retain the ability to file a lawsuit about the legal claims in this case. The exclusion deadline is [Month] [Day], [Year].
- **OBJECT:** Write to the Court about why you object to (i.e., don't like) the Settlement and think it shouldn't be approved. The objection deadline is [Month] [Day], [Year].
- **GO TO A HEARING:** The Court will hold a "Fairness Hearing" to consider the Settlement, the request for attorneys' fees and expenses of the lawyers who brought the Action ("Class Counsel"), and the Plaintiffs' request for service awards for bringing the Action. You may, but are not required to, speak at the Fairness Hearing about any Objection you filed. If you intend to speak at the Fairness Hearing, you must follow certain procedures stated on the Settlement website to notify the Court and parties of your intent when you serve your Objection.
- **DO NOTHING:** You will not receive a payment, even if the Court orders payment to Class Members. You will also be giving up your right to bring your own lawsuit related to the legal claims in this case. You will be eligible receive the non-monetary benefits of the Settlement, if the Settlement is finally approved.

To Parents and Guardians of Children on Facebook: The Settlement also involves the claims of minors featured in Sponsored Stories on Facebook. Please see the Settlement website for more information.

More information? For more information about the Settlement and how to take the actions described above, please visit [www.\[xxx\].com](http://www.[xxx].com) or write to the Settlement Administrator at *Fraley v. Facebook, Inc.*, Settlement, c/o GCG, [Address], [City], [State] [ZIP Code], [email@settlementname.com]. You may also contact Class Counsel, Robert S. Arns of the Arns Law Firm, by calling (800) 495-7800.